

**BAKER & HOSTETLER LLP**

45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Nicholas J. Cremona  
Email: ncremona@bakerlaw.com  
Dean D. Hunt  
Email: dhunt@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and the Estate of Bernard L. Madoff*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

ROBERT FRIED and JOANNE FRIED,  
individually and in their capacities as joint tenants

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-05239 (SMB)

with rights of survivorship,

Defendants.

**STIPULATION AND ORDER FOR EXTENSION OF TIME TO  
CONDUCT INITIAL CASE CONFERENCE**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, et seq. (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff individually, by and through his counsel, Baker & Hostetler LLP, and defendants Robert Fried and Joanne Fried (together, the “Defendants”), by and through their counsel, Pryor Cashman, LLP (collectively, the “Parties”), represent as follows:

**WHEREAS**, on November 10, 2010, this Court entered the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “LPO”) [Adv. Pro. No. 08-01789 (SMB), Dkt. No. 3141];

**WHEREAS**, the Trustee commenced this action (the “Adversary Proceeding”) by filing a complaint (the “Complaint”) on December 6, 2010 [Dkt. No. 1];

**WHEREAS**, Defendants filed an answer to the Complaint on August 17, 2015 [Dkt. 41];

**WHEREAS**, pursuant to the Notice of Applicability filed by the Trustee in this Adversary Proceeding on December 6, 2010 [Dkt. 2], the LPO and the avoidance procedures contained therein (the “Avoidance Procedures”) are applicable to the instant matter;

**WHEREAS**, under the Avoidance Procedures, “the parties shall meet, either in person or by teleconference, and confer on a mediation, discovery and litigation plan (the ‘Initial Case Conference’)” within 30 days after the last defendant files an answer to the Complaint (the “Initial Case Conference Period”);

**WHEREAS**, all Defendants have filed an answer to the Complaint on August 17, 2015

[Dkt. 41];

**WHEREAS**, the Trustee and Defendants have agreed to extend the Initial Case Conference Period in this Adversary Proceeding, which would otherwise have ended on September 16, 2015; and

**WHEREAS**, nothing in this Stipulation is a waiver of either side's right to request from the Court (and the other side's right to object to any such request), or the parties' rights to agree to, a further extension of the Initial Case Conference Period.

**NOW, THEREFORE**, the Parties stipulate and agree to, and the Court **ORDERS**, that the Initial Case Conference Period is hereby extended to September 30, 2015.

Dated: New York, New York  
September 1, 2015

**BAKER & HOSTETLER LLP**

By: /s/ Nicholas J. Cremona  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: 212.589.4200  
Facsimile: 212.589.4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Nicholas J. Cremona  
Email: ncremona@bakerlaw.com  
Dean D. Hunt  
Email: dhunt@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation  
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LLC and the Estate of Bernard L. Madoff*

**PRYOR CASHMAN, LLP**

By: /s/ Richard Levy, Jr.  
7 Times Square  
New York, New York 10036  
Richard Levy Jr.  
Email: rlevy@pryorcashman.com

*Attorneys for Defendants*

SO ORDERED ON September 2<sup>nd</sup>, 2015:

/s/ STUART M. BERNSTEIN  
HONORABLE STUART M. BERNSTEIN  
United States Bankruptcy Judge